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9 Attorney for Plaintiffs

10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE
12 NORTHERN MARIANA ISLANDS

13 LI YING HUA, LI ZHENG ZHE and XU JING JI,) CASE NO. CV 05-0019

14 Plaintiffs,)

15 vs.)

16 JUNG JIN CORPORATION, a CNMI corporation,)
17 ASIA ENTERPRISES, INC., a CNMI corporation,)
18 PARK HWA SUN, KIM HANG KWON,
19 KSK CORPORATION, a CNMI corporation,
20 and KIM KI SUNG,

21 FIRST AMENDED
22 NOTICE OF RULE 30(b)(6)
23 DEPOSITION OF KSK CORP.

24 Defendants.)

25 TO: KELLEY M. BUTCHER, ESQ.
26 Attorney for Defendants KSK CORPORATION and KIM KI SUNG

27 PLEASE TAKE NOTICE that, pursuant to Rules 26, 28 and 30 of the Federal Rules of Civil
Procedure, on Thursday, March 13, 2008, at the hour of 9:30 a.m. at the law office of Mark B.
Hanson, Second Floor, Macaranas Building, Beach Road, Garapan, Saipan, Commonwealth of the
Northern Mariana Islands, Plaintiffs' attorney will take the deposition of Defendant KSK
CORPORATION, PMB 234, P.O. Box 10,001, Saipan, MP 96950 ("KSK"), said deposition to
continue from day to day until completed. Such deposition will be taken upon oral examination for
the purpose of discovery, or as evidence, or both, pursuant to the Federal Rules of Civil Procedure,

1 before the undersigned who will administer the oath and shall be the officer before whom the
2 deposition is taken as that term is used in Fed. R. Civ. P. 28(a).

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4 Pursuant to Rule 30(b)(6), KSK shall, as known or reasonably available to it, designate and
5 produce for deposition one or more of the KSK's officers, directors, employees, managing agents,
6 consultants, auditors or other persons who consent to testify on KSK's behalf as to the subject
7 matters identified below for the time period from November 2002 through the date of the deposition
8 noticed hereunder including any continuance thereof (unless otherwise stated):

- 9 1. The review of documents in the possession, custody or control of KSK and the preparation a
10 the response thereafter to Plaintiffs' First Request for Production of Documents to KSK;
- 11 2. The substance of the documents produced by KSK in response to Plaintiffs' First Request for
12 Production of Documents to KSK;
- 13 3. The lending of money by KSK to anyone within the time period stated above, including the
14 preparation and execution of all documentation thereof;
- 15 4. The borrowing of money by KSK from anyone within the time period stated above, including
16 the preparation and execution of all documentation thereof;
- 17 5. The substance of the document attached hereto as Exhibit "A";
- 18 6. The nature and extent of any interest KSK has or previously had in any business entity,
19 whether a sole proprietorship, partnership, corporation, limited liability company, or any non-
20 profit association or corporation or any other business entity, that has or had any part of its
21 operations in the Commonwealth of the Northern Mariana Islands at any time from January
22 2000 through the date of the deposition noticed hereunder including any continuance thereof;
- 23 7. The substance of KSK's bank records and the keeping of its bank accounts, generally and with
24 respect to periodic deposits and withdrawals therefrom;
- 25 8. The substance of KSK's tax records and the preparation of all tax returns filed by KSK with

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any government agency;

9. The hiring, firing and employment of any employees of KSK, including Defendant Kim Ki Sung;

10. All information disclosed in KSK's "Rule 26 Discovery Disclosures" and any supplements thereto up to and including the day of the deposition noticed hereunder including any continuance thereof;

11. All responses to any additional discovery served by Plaintiffs on Defendants, or any of them, prior to the day of the deposition noticed hereunder including any continuance thereof;

12. Plaintiffs' allegations in their Second Amended Verified Complaint;

13. Defendants' Answer to Plaintiffs' Second Amended Verified Complaint and the factual basis for the affirmative defenses contained therein;

14. The relationships of the other defendants in this case to KSK, including but not limited to any stock ownership, officer, director or manager positions, dates of stock ownership, appointment, election, and/or employment, their duties and responsibilities, and their authority to enter into agreements on behalf of KSK or otherwise bind KSK by their actions;

15. The operations, income and expenses of KSK; and

16. The assets of KSK including, but not limited to any actual or intended disposition of such assets.

Pursuant to the provisions of Fed. R. Civ. Pro. 30(b)(2), you are hereby notified that the deposition shall be recorded by video tape and digital voice recorder rather than stenographic means.

You are invited to attend and cross-examine.

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1 DATED this 25th day of February, 2008.
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4 /s/ Mark B. Hanson
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6 MARK B. HANSON
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9 Beach Road, Garapan
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17 Attorney for Plaintiffs
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1 CERTIFICATE OF SERVICE

2 I hereby certify that a copy of the foregoing will be deposited in the United States Post Office,
3 first class mail, postage prepaid, addressed to the following:

4
5 Jung Jin Corporation
P.O. Box 503428
Saipan, MP 96950
6 (670) 235-4321

Park Hwa Sun
P.O. Box 503428
Saipan, MP 96950
7 (670) 235-4321

8 Asia Enterprises Inc.
P.O. Box 503448
Saipan, MP 96950
9 (670) 235-4321

Kim Hang Kwon
P.O. Box 503448
Saipan, MP 96950
10 (670) 235-4321

11 I further certify that the following were served with a copy of the foregoing via the Court's
12 electronic case filing system and via e-mail:

13 G. Anthony Long
Kelley M. Butcher
14 LAW OFFICES OF G. ANTHONY LONG
P.O. Box 504970
15 Saipan, Mariana Islands 96950
E-mail: gal@nmilaw.com
16 kmb@nmilaw.com

17
18 DATED: February 25, 2008 /s/ Mark B. Hanson
19 MARK B. HANSON

| | | | |
|----|-------------|------------|--------|
| 1 | \$60,000.00 | 2004.11.30 | 비고 |
| 2 | \$60,000.00 | 12.30 | |
| 3 | \$60,600.00 | 2005.1.30 | |
| 4 | \$61,200.00 | 2.30 | |
| 5 | \$61,800.00 | 3.30 | |
| 6 | \$62,400.00 | 4.30 | |
| 7 | \$63,000.00 | 5.30 | |
| 8 | \$63,600.00 | 6.30 | |
| 9 | \$64,200.00 | 7.30 | 패션 네비힐 |
| 10 | \$64,800.00 | 8.30 | |
| 11 | \$65,400.00 | 9.30 | |
| 12 | \$66,000.00 | 10.30 | |
| 13 | \$66,600.00 | 11.30 | |
| 14 | \$67,200.00 | 12.30 | |
| 15 | \$67,800.00 | 2006.1.30 | |
| 16 | \$68,400.00 | 2.30 | |
| 17 | \$69,000.00 | 3.30 | |
| 18 | \$69,600.00 | 4.30 | |
| 19 | \$70,200.00 | 5.30 | |
| 20 | \$70,800.00 | 6.30 | |
| 21 | \$71,400.00 | 7.30 | |
| 22 | \$72,000.00 | 8.30 | |
| 23 | \$72,600.00 | 9.30 | |
| 24 | \$73,200.00 | 10.30 | |
| 25 | \$73,800.00 | 11.30 | |
| 26 | \$74,400.00 | 12.30 | |
| 27 | \$75,000.00 | 2007.1.30 | |
| 28 | \$75,600.00 | 2.30 | |
| 29 | \$76,200.00 | 3.30 | |
| 30 | \$76,800.00 | 4.30 | |
| 31 | \$77,400.00 | 5.30 | |

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1. 겟날은 매월 30일로 한다. <겟돈은 잘 내지 않을 경우 그달에 태워 주지 않는다.>
2. 겟돈은 꼭 현찰이어야 한다.<TC, 수표는 절대 안 됨, 보증인을 세운다.>
3. 겟돈은 PM : 12 ~ 1시 사이에 갖고 오지 않을 경우 벌금 \$ 30.00 추가한다.
4. 매월 30일이 추석, 구정, 일요일 경우에만 다음 날로 한다.
5. 겟날 계원이 사이판 출타시 계주나 아는 사람에게 말기고 계주에게 연락한다.

EX A.